



U.S. Department of Energy

Richland Operations Office

P.O. Box 550

Richland, Washington 99352

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OCT 20 1997



Mr. E. R. Skinnarland
200 Area Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West 4th Avenue
Kennewick, Washington 99336-6018

Dear Mr. Skinnarland:

REQUEST FOR RESPONSES TO SUPPLEMENTAL NOTICE OF DEFICIENCY (NOD) COMMENTS
REGARDING THE GROUNDWATER SECTION OF THE NONRADIOACTIVE DANGEROUS WASTE
LANDFILL (NRDWL) CLOSURE/POSTCLOSURE PLAN, AUGUST 30, 1990. DOE/RL-90-17

The U.S. Department of Energy (DOE) transmitted the NRDWL Closure/Postclosure Plan, DOE/RL-90-17, Rev. 0, to the State of Washington Department of Ecology (Ecology) in August 1990. A partial set of NOD comments on the plan were received from Ecology on January 10, 1994, followed by a supplemental set of comments on April 17, 1997, requesting a response by October 20, 1997. The response to these NODs were discussed with Ecology during a Unit Managers' Meeting on June 4, 1997. An agreement was reached such that the DOE Richland Operations Office's (RL) response to the NOD's could be delayed in order to perform and evaluate the results of a soil gas survey at NRDWL.

RL recognizes the Ecology staff member's concerns that the strategy may not have appropriately prioritized the NRDWL as a site within the Nonradioactive Waste Landfill Group (NWLG) considering that the landfill may be a potential source for groundwater contamination. One objective of the soil gas sampling effort, conducted in August 1997 and September 1997, was to evaluate the need to adjust the NRDWL's priority based on the results of the survey. The soil gas survey was completed this summer and reported in "Evaluation of the Soil Gas Survey at the Nonradioactive Dangerous Waste Landfill, BHI-01115, Rev. 0." RL believes these results do not merit changing the current priorities for NRDWL as described in the Waste Site Grouping Report for 200 Area Soil Investigations (DOE/RL-96-81, Rev. 0).

As you know, DOE has been in negotiations with the U.S. Environmental Protection Agency and Ecology for the major part of this past fiscal year in an effort to reach tentative agreement on proposed Hanford Federal Facility Agreement and Consent Order milestone revisions which allow work to be initiated on the first six waste groups outlined in the 200 Areas Soil Remediation Strategy for the Environmental Restoration Program. NRDWL does not fall into those first six waste groups. In fact, the NRDWL waste site (NWLG) is not scheduled to start before fiscal year 2005 due to other waste site groups ranking higher in terms of potential threat to the environment. This schedule provides the basis for why DOE believes it would be premature to provide responses to the supplemental NOD comments by October 20, 1997. RL is prepared to meet with Ecology to discuss the recent soil gas results and any potential impacts to the underlying groundwater for the purpose of reevaluating the existing priority of the NRDWL.

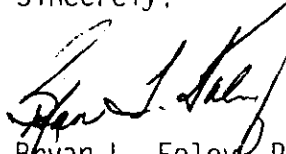
Mr. E. R. Skinnarland

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If you have any questions regarding the letter report, please contact me at 376-7087.

Sincerely,



Bryan L. Foley, Project Manager
Groundwater Project

GWP:BLF

cc: L. Cusack, Ecology
J. Donnelly, Ecology
V. Dronen, BHI
M. Jaraysi, Ecology
G. Mitchem, BHI
S. Mohan, Ecology